

# EXHIBIT J

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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In re: NEURONTIN MARKETING, SALES PRACTICES, : MDL Docket No. 1629  
AND PRODUCTS LIABILITY LITIGATION :  
: Master File No. 04-10981  
: Judge Patti B. Saris  
-----X  
THIS DOCUMENT RELATES TO: : Magistrate Judge Leo T.  
: Sorokin  
-----X  
LINDA B. SHEARER, as Administratrix of the Estate of :  
HARTLEY PARKER SHEARER a/k/a HARTLEY SHEARER, :  
deceased :  
07 CA 11428 PBS :  
-----X

**PLAINTIFF'S FURTHER SUPPLEMENTAL DISCLOSURE STATEMENT**

PLEASE TAKE NOTICE, that, pursuant to Rule 26 of the Federal Rules of Civil Procedure, Plaintiff(s), by their attorneys, make and supplement their disclosures as follows.

These disclosures are made subject to all objections as to competence, materiality, relevance, or other objections as to admissibility that may apply in the event that any such response, or the information contained in it, is sought to be used in court. Plaintiff(s) expressly reserve all such objections.

**A. Rule 26(a)(1)(A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.**

Discovery and investigation in this action is ongoing. Based on the information reasonably available, Plaintiff(s) are unable at the present time to identify each and every individual who would

have discoverable information that Plaintiff(s) may use to support their claims or defenses in this case, and the subjects of such information. Plaintiff(s) reserve the right to supplement these disclosures as they become aware of additional individuals who have such information.

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following individuals may have information that Plaintiff(s) may use to support their claims or defenses in this action:

1. Linda Shearer, 1616 Kipling St, Apt C, Houston, TX 77006, telephone number 413-530-0819;
2. Ivor Shearer, 2013 N Rampart St, New Orleans, LA 70116, telephone number 518-237-4632;
3. Sean Wheeler, address unknown;
4. Peggy Diggs, 1097 Main St, Williamstown, MA 01267, telephone number 413-458-8702;
5. Ed Epping, 1097 Main St, Williamstown, MA 01267, telephone number 413-458-8702;
6. Judy Raab, 139 Bulkley St, Williamstown, MA 01267, telephone number 413-458-3870;
7. Larry Raab, 139 Bulkley St, Williamstown, MA 01267, telephone number 413-458-3870;
8. Drs. Jon Valigorsky and Deborah August, Office of the Chief Medical Examiner, 720 Albany St, Boston, MA 02118, telephone number 617-267-6767;
9. Officer Paul Thompson, Officer Rivers, Officer Skorupski and Chief Parker, Williamstown Police Department, 31 North St, Williamstown, MA 01267, telephone number 413-458-5733;
10. Trooper Michael J. Hill, Commonwealth of Massachusetts, Department of State Police, Detective Unit-Berkshire County, PO Box 2129, Pittsfield, MA 01202, telephone number 508-820-2300;
11. EMTs Scot Spring, John Moulton, Larry Therrien, Thomas Decker and Michael Gleason of the North Adams Ambulance Service, 10 Harris St, North Adams, MA 01247, telephone number 413-664-6680;

12. Neurontin prescribing physician Dr. Daniel Sullivan at Cleveland Clinic Solon, 29800 Bainbridge Rd, Solon, OH 44139, telephone number 440-519-6867;
13. Neurontin prescribing physician Dr. Keith Edwards, South Western Vermont Medical Center, 100 Hospital Dr, East Bennington, VT 05201, telephone number 802-447-7577;
14. Neurontin prescribing physician Dr. Wilfred Hynes, Harrington Physician Services, 94 South St, Southbridge, MA 01550 and Harrington Physician Services, 128 Main St #4, Sturbridge, MA 01566;
15. Physicians and staff personnel at Williamstown Medical Associates, 197 Adams Rd, Williamstown, MA 01267, including Drs. Daniel Sullivan, Smeglin, Stuebner, Kleederman, Payne, Coffield, Parkinson, O'Neill, Baisch, Dagostino, Sethi, Rosenthal, Whateley, Turton and Connor, telephone number 413-458-8182;
16. Physicians and staff personnel at Neurological Consultants, PC, 140 Hospital Dr, Bennington, VT 05201, telephone number 802-447-7577;
17. Physicians and staff personnel at Berkshire Medical Center, 725 North St, Pittsfield, MA 01201, telephone number 413-447-2000;
18. Physicians and staff personnel at North Adams Regional Hospital, 71 Hospital Ave, North Adams, MA 01247, telephone number 413-663-3701;
19. Physicians and staff personnel at Spaulding Rehab Hospital, 125 Nashua St, Boston, MA 02114, including Dr. Handel, telephone number 617-573-7000;
20. Physicians and staff personnel at Brigham & Women's Hospital, 75 Francis St, Boston, MA 02115, telephone number 617-732-5500;
21. Dr. Lisa Catapano-Friedman, 357 Sheilds Dr, Bennington, VT 05201, telephone number 802-442-3757;
22. Dr. William Chambers, 1120 Park Ave, New York, NY 10128, telephone number 212-860-0351;
23. Dr. Elaine Hantman, 10 Meadows St, Williamstown, MA 01267, telephone number 413-458-4213;
24. Dr. Douglas Herr, 77 Hospital Ave, North Adams, MA 01247, 413-663-3400;
25. Dr. Anne Hudson Angevine, Hematology Oncology Associates, PC, 34 Shelburne Rd, Stamford, CT 06902;

26. Dr. O'Neil Britton, Brigham & Women's Hospital, General Medicine Division, 1620 Tremont St, Boston, MA 02120;
27. Dr. Maria Yialamas, Brigham Circle Medical Associates, 75 Francis St, PBB-B-2, Room 227, Boston, MA 02115;
28. Dr. John Loughrey, Rotunda Hospital, Parnell Square W, Dublin 1, Ireland;
29. Michael Fagan, Defendants' Territory Manager/sales and marketing employee;
30. Paresh Desai, Defendants' Territory Manager/sales and marketing employee;
31. Mark Poulin, Defendants' Territory Manager/sales and marketing employee;
32. Defendants' Regional or District Sales Managers who supervised, trained, or coached the territory manager(s) and/or sales representatives who detailed Plaintiff decedent's healthcare providers regarding Neurontin.
33. Employees and representatives of the Defendants Pfizer, Inc., Parke-Davis, a division of Warner-Lambert Company and Warner-Lambert Company LLC, Warner-Lambert Company, and Warner Lambert Company LLC ("Defendants") who had any communication relating to Neurontin with, or were otherwise in contact relating to Neurontin with the healthcare providers(s) who treated Plaintiff(s) or prescribed Neurontin to Plaintiff(s) and/or Plaintiffs' decedents;
34. Any witness identified or disclosed by Defendants;
35. Any witness identified in Plaintiff or Defendants' disclosure of expert testimony;
36. Any witness identified in Plaintiff or Defendants' prior Rule 26 disclosures;
37. Any other witness disclosed or identified by Plaintiff or Defendants during the course of discovery;
38. Any witness necessary to authenticate documents;
39. Defendants' employees and representatives with knowledge as to the safety and/or efficacy of Neurontin, including those listed below;
40. Defendants' employees and representatives with knowledge as to the sale, promotion and/or marketing of Neurontin, including those listed below;
41. Defendants' employees and representatives with knowledge of Clinical Research and Development of Neurontin, including those listed below;

42. Defendants' employees and representatives with knowledge of Medical Information pertaining to Neurontin, including those listed below;
43. Defendants' employees and representatives with knowledge of Medical Liaisons and Neurontin, including those listed below;
44. Defendants' employees and representatives with knowledge of Medical and Scientific Affairs and Neurontin, including those listed below;
45. Defendants' employees and representatives with knowledge of Regulatory affairs and Neurontin, including those listed below;
46. Defendants' employees and representatives with knowledge of Clinical Development and Neurontin, including those listed below;
47. Defendants' employees and representatives with knowledge of Drug Safety and Risk Management and Neurontin, including those listed below;
48. Defendants' employees and representatives with knowledge of Marketing Analytics and Neurontin, including those listed below;
49. Defendants' employees and representatives with knowledge of Medical affairs and Neurontin, including those listed below;
50. Defendants' employees and representatives with knowledge of Medical Grants and Neurontin, including those listed below;
51. Defendants' employees and representatives with knowledge of Medical/Program Planning & Management and Neurontin, including those listed below;
52. Defendants' employees and representatives with knowledge of Outcomes Research & Development and Neurontin, including those listed below;
53. Defendants' employees and representatives with knowledge of RMRS and Neurontin, including those listed below;
54. Defendants' employees and representatives with knowledge of Statistical Analysis and Neurontin, including those listed below;
55. David Franklin, Whirly Circle, Hopkinton, MA;
56. Jeffrey Kindler, CEO, Pfizer, Inc.;
57. Frank D'Amelio, Sr. VP and Chief Financial Officer, Pfizer, Inc.;
58. William Ringo, Sr. VP, Strategy and Business Development, Pfizer, Inc.;

59. Markin Mackay, President, Pfizer Global Research & Development, Pfizer, Inc.;

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following additional employees, agents or representatives of the Defendants may have information relating to FDA issues pertaining to Neurontin or otherwise relevant to the issues in this case that Plaintiff(s) may use to support their claims in this action:

Mi Dong	Clinical Research and Development
Elizabeth Garofalo	Clinical Research and Development
Lloyd Knapp	Clinical Research and Development
Linda LaMoreaux	Clinical Research and Development
Atul Pande	Clinical Research and Development
Mark Pierce	Clinical Research and Development
Wolfgang Reimann	Clinical Research and Development
David Rowbotham	Clinical Research and Development
Charles Taylor	Clinical Research and Development
V. Trudeau	Clinical Research and Development

Helen Duda-Racki	Medical Information
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Mike Davies	Medical Liaisons
LeeAnne Fogleman	Medical Liaisons
Richard Grady	Medical Liaisons
Lisa Kellett	Medical Liaisons
Ken Lawlor	Medical Liaisons
Joe McFarland	Medical Liaisons
Darryl Moy	Medical Liaisons

Elizabeth Attias	Medical and Scientific Affairs
Adrian Bal	Medical and Scientific Affairs
James Black	Medical and Scientific Affairs
Jyoti Jankowski	Medical and Scientific Affairs
Philip Magistro	Medical and Scientific Affairs

William Sigmund	Medical and Scientific Affairs
Leslie Magnus-Miller	Medical and Scientific Affairs

Alan Blumberg	Regulatory
James Parker	Regulatory
Jonathon Parker	Regulatory
Alan Rubenstein	Regulatory

Susan Stanco  
Lester Reich  
Janeth Turner

Regulatory  
Regulatory  
Regulatory

Michele Meager  
John Boris  
George Cavic  
J. Allen Crook  
Victor Delimata  
Chris DeSimone  
Robert Doyle  
John Ford  
Tim George  
Edda Guerrero  
John Howard  
Laura Johnson  
John Knoop  
Nancy Kohler  
John Krukar  
David Murphy  
John Richter  
Tim Windom  
John Woychick

Sales/Marketing  
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Sales/Marketing  
Sales/Marketing

Larry Alphs  
Douglas Feltner

Clinical Development  
Clinical Development

Lalitha Aiyer  
Gretchen Dieck  
Greg Gribko  
Manfred Hauben  
Tina Ho  
Douglas Kargman  
Emily Lanigan  
Elizabeth Luczak  
Jeffrey Mohan  
Esperanza Molina  
Kathy Sigler  
Deepak Taneja  
Tina Zhang

Drug Safety and Risk Management  
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Drug Safety and Risk Management  
Drug Safety and Risk Management  
Drug Safety and Risk Management  
Drug Safety and Risk Management  
Drug Safety and Risk Management  
Drug Safety and Risk Management

Melissa Dana  
Suzanne Doft  
Allison Fannon  
Marino Garcia  
Craig Glover

Marketing  
Marketing  
Marketing  
Marketing  
Marketing



Christine Grogan	Marketing
Leigh Ann Hemenway	Marketing
John Krayacich	Marketing
John Marino	Marketing
Michele Mays	Marketing
Avanish Mishra	Marketing
Steve Piron	Marketing
David Probert	Marketing
Jason Totolis	Marketing
Meg Yoder	Marketing
Andrea Zuechner Malone	Marketing
 Nancy Mancini	 Marketing Analytics
Robert Glanzman	Medical
Bruce Parsons	Medical
Leslie Tive	Medical
Christopher Wohlberg	Medical
Claire Wohlhuter	Medical
 Suzan Carrington	 Medical Grants
Maria McCauley	Medical Grants
 Steve Brigandi	 Medical/Program Planning & Management
Catherine Clary	Medical Information
Michelle Claussen	Medical Information
Helen Duda-Racki	Medical Information
John Rocchi	Medical Information
Julie Su	Medical Information
Adrian Vega	Medical Information
 Ellen Dukes	 Outcomes Research & Development
 Kay Sumulak	 Postmarket Safety
Rudi Altevogt	Regulatory
Mary Ann Carnel	Regulatory
Lucy Castro	Regulatory
Art Ciociola	Regulatory
Stephen Cristo	Regulatory
Andrea Garrity	Regulatory
Chris Pacella	Regulatory
Manini Patel	Regulatory
Drusilla Scott	Regulatory

Valerie Flapan	Review Committee
Carolyn Blankmeister	RMRS
Tim Hylan	RMRS
Jill Kerrick Walker	RMRS
Dale Amon	Sales
Kim Brett	Sales
Mark Brown	Sales
Chris Dowd	Sales
Mike Fox	Sales
Bruce Fleischman	Sales
Chris Gish	Sales
David Gruber	Sales
Dan Linden	Sales
Tamela Martin	Sales
Kathy Rivas	Sales
Michael Romano	Sales
James Schultz	Sales
Guy Cohen	Statistical Analysis
Jack Cox	Pfizer Spokesman
Paul Fitzhenry	Pfizer Spokesman
Bryant Haskins	Pfizer Spokesman

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following additional individuals may have information relating to FDA issues pertaining to Neurontin or otherwise relevant to the issues in this case that Plaintiff(s) may use to support their claims in this action:

Cynthia McCormick  
McCormick Consulting LLC  
9127 Friars Road  
Bethesda, MD 20993

Paul Leber  
Neuro-Pharm Group, LLC  
11909 Smoketree Road  
Potomac, MD 20854

Russell Katz  
Director, Division of Neurology  
FDA, FDA 120  
1451 Rockville Pike, Rm 4037  
Rockville, MD 20852

Sharon Hertz  
Deputy Director  
FDA, Division of Anesthesia, Analgesia, and Rheumatology Products  
10903 New Hampshire Avenue  
Silver Spring, MD 20993

Timothy McGovern  
Supervisory Pharmacologist  
Office of New Drugs  
Center for Drug Evaluation and Research  
FDA  
10903 New Hampshire Avenue  
Silver Spring, MD 20993

Laura A. Governale  
Team Leader, Drug use Data Specialist  
Office of Surveillance and Epidemiology  
Center for Drug Evaluation and Research  
FDA  
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10903 New Hampshire Avenue  
Silver Spring, MD 20993

Lisa L. Stockbridge, Ph.D.  
Regulatory Reviewer  
FDA, Division of Drug Marketing  
Advertising and Communications  
Rockville, MD 20857

Lesley R. Frank, Ph.D., J.D.  
Division of Drug Marketing, Advertising and Communications  
Center for Drug Evaluation and Research  
FDA  
Rockville, MD 20857

David Cooper, M.D.  
162 Irving Avenue  
South Orange, New Jersey 07079  
c/o Medical Action Communications

Michael J. McLean, M.D., Ph.D.,  
c/o Vanderbilt University  
2311 Pierce Avenue, Nashville, TN 37212

John Holtz  
c/o NFO Migliara/Kaplan  
9 Park Center Ct.  
Owings Mills, MD

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following individuals may have information that the Plaintiff(s) may use to support their claims or defenses in this action:

Members of the Food and Drug Administration (FDA), Center for Drug Evaluation and Research (CDER) Advisory Committee, who attended the July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic drugs Advisory Committee (PDAC), to wit:

Britt Anderson, MD, PhD  
University of Waterloo  
200 University Avenue West  
Waterloo, ON Canada N2L 3G1

Jorge Armenteros, MD  
2199 Ponce De Leon Blvd, Suite 304  
Coral Gables, FL 33134

Robert W. Buchanan, MD  
University of Maryland School of Medicine  
Maryland Psychiatric Research Center, Rm 1-19  
PO Box 21247  
Baltimore, MD

Rochelle Caplan, MD  
Semel Institute for Neuroscience and Human Behavior  
UCLA  
760 Westwood Plaza, Rm 48-269  
Los Angeles, CA 90024

Larry Goldstein, MD  
Duke University Medical Center, Rm 201A  
Bryan Research Building  
Durham, NC 27710

Mark W. Green, MD  
Columbia University  
16 East 60<sup>th</sup> St, Suite 440  
New York, NY 10022

Gail W. Griffith, MS  
Washington, DC 20009

Gregory Holmes, MD, PhD  
Dartmouth-Hitchcock Medical Center  
One Medical Center Dr  
Lebanon, NH 03756

Lily Jung, MD, MMM  
Swedish Director, Neurology Clinic  
Swedish Neuroscience Institute  
Medical Center, Neurology Clinic  
600 Broadway, Suite 200  
Seattle, WA 98722

LCDR Kiem-Kieu H. Ngo, Pharm. D  
BCPS, CDER, FDA  
5630 Fishers Lane, Rm 1079  
Rockville, MD 20857

Ying Lu, PhD  
University of California San Francisco  
185 Berry St, Suite 350  
San Francisco, CA 94143

Sandra F. Olson, MD  
Northwestern University Chicago  
710 North Lake Shore, 11<sup>th</sup> Floor  
Chicago, IL 60611

Matthew Rizzo, MD  
Director, Division of Neuroergonomics  
University of Iowa  
200 Hawkins Dr, Rm 2144  
Iowa City, IA 52242

Stacy Ann Rudnicki, MD  
Department of Neurology  
University of Arkansas for Medical Sciences  
4301 W. Markham, #500  
Little Rock, AK 72205  
Susan K. Schultz, MD  
Associate Professor of Psychiatry  
University of Iowa College of Medicine  
2-207 Psychiatry Research  
500 Newton Rd  
Iowa City, IA 52242-1000

Marcia J. Slattery, MD, MHS  
Department of Psychiatry  
University of Wisconsin School of Medicine and Public Health  
6001 Research Blvd  
Madison, WI 53719

Yvette Waples, Pharm. D.  
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5630 Fishers Lane, Rm 1099  
Rockville, MD 20857

Robert Woolson, PhD  
Professor, Department of Biostatistics, Bioinformatics and Epidemiology  
Medical University of South Carolina  
135 Cannos St, Suite 303  
PO Box 250835  
Charleston, SC 29425

Robert Temple, MD  
Director, Office of Drug Evaluation  
CDER, FDA  
5630 Fishers Lane  
Rockville, MD 20857

Russel Katz, MD  
Director, Division of Neurology Products  
CDER, FDA  
5630 Fishers Lane  
Rockville, MD 20857

Tom Laughren, MD  
Director, Division of Psychiatry Products  
CDER, FDA

5630 Fishers Lane  
Rockville, MD 20857

Alice Hughes, MD  
Associate Director for Safety, Division of Neurology Products  
CDER, FDA  
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Rockville, MD 20857

Evelyn Mentari, MD, MS  
Clinical Safety Reviewer, Division of Neurology Products  
CDER, FDA  
5630 Fishers Lane  
Rockville, MD 20857

Mark Levenson, PhD  
Statistical Safety Reviewer  
Quantitative Safety & Pharmacoepidemiology Group  
Division of Biometrics 6  
CDER, FDA  
5630 Fishers Lane  
Rockville, MD 20857

Joyce Cramer  
President, Epilepsy Therapy Project  
Yale University School of Medicine  
950 Campbell Ave  
West Haven, CT 06516-2770

Jacqueline French  
New York University  
NYS Langone Medical Center  
530 First Ave  
New York, NY 10016

Frank Gilliam, MD  
Epilepsy Foundation  
8301 Professional Place  
Landover, MD 20785

Wayne Goodman, MD  
National Institute of Mental Health  
6001 Executive Blvd, Rm 7123, MSC 9632  
Bethesda, MD

Sean Hennessy, PhD

University of Pennsylvania  
423 Guardian Dr  
803 Blockley Hall  
Philadelphia, PA 19104

Daniel S. Pine, MD  
National Institute of Mental Health  
Intramural Research Program  
Building 1, Room B310-0135  
1 Center Dr MSC 0135  
Bethesda, MD 20895

Darrel Regier, MD  
American Psychiatric Association  
1000 Wilson Blvd, Suite 1825  
Arlington, VA 22209

Christopher Wohlberg  
Pfizer Inc.  
New York, NY

Subject to the foregoing and without waiver of any of Plaintiff(s) rights, the following additional individuals may have information relating to FDA issues pertaining to Neurontin or otherwise relevant to the issues in this case that Plaintiff(s) may use to support their claims in this action:

Members of the American Epilepsy Society expert panel the reviewed the FDA's meta-analysis of antiepileptic drugs, to wit:

Dennis Spencer, MD  
American Epilepsy Society  
Yale University School of Medicine  
Department of Neurosurgery  
PO Box 208082  
New Haven, CT 06520

Andres Kanner, MD  
Rush Medical center  
1725 W Harrison St, Suite 1118  
Chicago, IL 60612



Dale Hesdorffer, MD  
Columbia University  
630 West 168<sup>th</sup> St, P&S Unit 16, PH 19, Rm 308  
New York, NY 10032

Anne Berg, PhD  
Northern Illinois University  
Department of Biological Sciences  
MO 429A, Lab 429  
DeKalb, IL 60115

John Barry, MD  
Stanford University  
401 Quarry Road MC5723  
Stanford, CA 94305-5723

Rochelle Caplan, MD  
Semel Institute for Neuroscience and Human Behavior  
University of California at Los Angeles  
760 Westwood Plaza, Rm 48-269  
Los Angeles, CA 90024

Jacqueline French  
New York University  
NYU Langone Medical Center  
530 First Ave  
New York, NY 10016

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Plaintiff(s) reserve the right to amend or supplement without prejudice any and all disclosures herein consistent with those developments, including product identification, identifying other relevant witnesses and additional areas of information that support Plaintiff's claims and defenses in this case and identifying additional individuals with discoverable information that may be used to support Plaintiff's claims or defenses in this case.

**B. Rule 26(a)(1)(B): A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the**

**party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.**

Because discovery and investigation in this action is ongoing, Plaintiff is unable at the present time, based on the information readily available, to identify all documents, compilations, and tangible things, if any, that Plaintiff may use to support claims or defenses in this case and the subject of such information.

Subject to the foregoing and without waiving any of Plaintiff's rights, Plaintiff submits the following documents the Plaintiff may use to support their claims or defenses in this action:

1. Family photographs;
2. Funeral records;
3. Plaintiff's decedent's tissue, blood, fluid, or serum samples, and pathology slides;
4. Medical Examiner's report;
5. Williamstown Police Department records;
6. Massachusetts Department of State Police records;
7. North Adams Ambulance Service records and bills;
8. Dr. Daniel Sullivan records and bills;
9. Dr. Keith Edwards records and bills;
10. Dr. Wilfred Hynes records and bills;
11. Williamstown Medical Associates records and bills;
12. South Western Vermont Medical Center records and bills;
13. Neurological Consultants, PC records and bills;
14. Berkshire Medical Center records and bills;
15. North Adams Regional Hospital records and bills;
16. Spaulding Rehab Hospital records and bills;

17. Brigham & Women's Hospital records and bills;
18. Dr. Lisa Catapano-Friedman records and bills;
19. Dr. William Chambers records and bills;
20. Dr. Elaine Hantman records and bills;
21. Dr. Douglas Herr records and bills;
22. Dr. Anne Hudson Angevine records and bills;
23. Dr. O'Neil Britton records and bills;
24. Dr. Maria Yialamas records and bills;
25. Dr. John Loughrey records and bills;
26. All exhibits and other materials submitted in support of Plaintiff or Decedents' Motions and/or responses, including and supplemental filings in support of these motions, in this action;
27. All exhibits required for authentication of documents and things;
28. All documents and things identified in Plaintiff and Defendants' prior Rule 26 disclosures;
29. All other documents and things produced, disclosed, or identified by Plaintiff or Defendants during the course of discovery;
30. Documents produced or used by any party or any third party in this case;
31. Deposition transcripts and documents identified as exhibits at all depositions taken in MDL Docket No.1629, including the depositions taken in this action;
32. Documents produced by any party or any third party in the civil action captioned *Harden Manufacturing Corp, et. al., v. Pfizer Inc., and Warner-Lambert Company MDL No.1629, Master File No. 04-10981*;
33. Documents produced by Defendants in the civil action captioned *Crone v. Pfizer et. al.*, Supreme Court, State of California (Lake County), CV400432, including but not limited to Defendant's Response to Plaintiffs' Request for Admissions Set Three, Defendant's Response to Request for Admissions Propounded by Plaintiffs, Request for Admissions Set One, and Defendants' Response to Plaintiffs' Request for Admissions Set One;

34. Documents produced by any party or any third party in the civil action captioned *United States of America ex rel. David Franklin v. Parke-Davis, et al.*, C.A. No. 96-11651-PBS (D. Mass.);
35. Documents produced by Defendants in the civil action captioned *Young v. Pfizer, et. al.*, Supreme Court, State of New York (Orange County), Index 1062/04;
36. Documents in the possession or control of Defendants or Defendants' counsel;
37. All package inserts, product labeling, or core data sheets, including drafts of same, regarding Neurontin or Gabapentin;
38. All package inserts, product labeling, or core data sheets regarding Lyrica or Pregabalin;
39. Relevant documents contained in regulatory files, including the New Drug Application and Investigational New Drug Application and Supplemental New Drug Application for Neurontin and Lyrica;
40. Relevant documents and data disclosed by Defendants' relating to Neurontin from the following departments: safety surveillance and analysis files; medical information; regulatory; outcomes research & development; postmarket safety; review committee; RMRS; sales; marketing; statistical analysis; clinical research & development; medical liaisons; medical and scientific affairs; drug safety and risk management; marketing analytics; medical; medical grants; and medical/program planning & management;
41. Medical literature and/or journal articles produced by Defendants;
42. Published medical and scientific literature concerning Neurontin and Plaintiff's decedent's medical conditions;
43. Documents reviewed, considered and/or relied upon by Plaintiff experts or Defendants' experts in this case as set forth in previously exchanged expert disclosures or otherwise referenced in any such expert's deposition testimony taken in this litigation.
44. Data disk (hard drive) compilation of materials provided by Plaintiff in response to Defendants' Notice of Deposition of Cheryl Blume, Ph.D., and accompanying Exhibit A demand for documents, previously provided to Defendants and marked for identification as exhibit 2 at the deposition of Product Liability Plaintiffs' expert, Cheryl Blume, Ph.D., on November 12, 2007;
45. Data disk of adverse drug event information, previously disclosed to Defendants and marked for identification as exhibit 7, entitled *Disk In Re: Neurontin; Keith Altman ADE Files (10/28/07)*, at the deposition of Product Liability Plaintiffs' expert, Cheryl Blume, Ph.D., on November 12, 2007;

46. Publicly available documents from Food & Drug Administration (FDA), including but not limited to the following:
- a. Guidance Documents from FDA's Center for Drug Evaluation and Research, to wit: Drug Safety – Adverse Event Reporting; Drug Safety – Reviewer Guidance, Conducting a Clinical Safety Review of a New Product Application; Drug Safety – FDA's Communication to the Public; Good Pharmacovigilance Practices and Pharmacoepidemiologic Assessment;
  - b. FDA Drug Advisory Committee Meetings, including Meetings of the Dermatologic and Ophthalmic Drugs Advisory Committee regarding associated psychiatric events with use of Accutane (isotretinoin); Meetings of the Peripheral and Central Nervous System Drugs Advisory Committee regarding associated psychiatric events with use of Tetrabenazine;
  - c. Medwatch FDA Adverse Event Reporting System (AERS);
  - d. FDA Public Health Advisory for Gabitril (tiagabine) February 18, 2005;
  - e. FDA Alert for Accutane (Isotretinoin), July 2005;
  - f. FDA, Division of Neurology Products; Suicidality and Anti-epileptic Drugs: Status of Clinical Trial Data Analysis (November 2006), at [www.fda.gov/ohrms/dockets/ac/06/slides/2006-4254s\\_08\\_Mentari\\_Oxcarbazepine\\_files/slide0001.htm](http://www.fda.gov/ohrms/dockets/ac/06/slides/2006-4254s_08_Mentari_Oxcarbazepine_files/slide0001.htm);
  - g. FDA Alert for Antiepileptic Drugs, January 31, 2008;
47. Publicly available documents from Pfizer's [www.zoloft.com](http://www.zoloft.com), including but not limited to the following: Medication Guide, Welcome to Zoloft.com; How Zoloft Works; and Dramatization;.
48. Publicly available documents from Wayne State University, located at <http://www.med.wayne.edu/psychiatry/cme/presentation/February2007/Feb28/feb28.html>, relating to Suicidality;
49. Publicly available documents from International Conference on Bipolar Disorder located at <http://www.wpic.pitt.edu/Stanley/3rdbipconf/Sessions/sess6main.html> relating to Neurontin safety and efficacy;
50. Food and Drug Administration's "Statistical Review and Evaluation – Anti epileptic Drugs and Suicidality,": dated May 23, 2008, available at the following website: <http://www.fda.gov/ohrms/dockets/ac/cder08.html#PeripheralCentralNervousSystem>;
51. Agenda, Meeting Roster, and Advisory Committee Questions presented at Food and Drug Administration's July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory

Committee (PDAC), previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr. Kruszewski and Dr. Blume. See MDL ECF Doc. # 1365;

52. Food and Drug Administration (FDA) Memorandum and Briefing Document, June 12, 2008, for the July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC) prepared by Russell Katz, MD, Director, Division of Neurology Products/HFD-120, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr. Kruszewski and Dr. Blume. See MDL ECF Doc. # 1365. The document is also available at the following website:  
<http://www.fda.gov/ohrms/dockets/ac/cder08.html#PeripheralCentralNervousSystem>;
53. FDA Clinical Review June 12, 2008: Antiepileptics and Suicide Data, by Evelyn Mentari, MD, MS, Clinical Safety Reviewer, Division of Neurology Products, CDER, FDA, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr. Kruszewski and Dr. Blume. See MDL ECF Doc. # 1365. The document is also available at the following website:  
<http://www.fda.gov/ohrms/dockets/ac/cder08.html#PeripheralCentralNervousSystem>;
54. FDA's powerpoint slide presentations related to Antiepileptic Drugs and Suicidality by Evelyn Metari, MD, MS, Clinical Safety Reviewer, Division of Neurology Products, CDER, FDA, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr. Kruszewski and Dr. Blume. See MDL ECF Doc. # 1365;
55. FDA's powerpoint slide presentations of FDA analysis and in rebuttal to Pfizer's analysis of Gabapentin and Pregabalin, by Mark Levenson, PhD, Statistical Safety Reviewer, Quantitative Safety and Pharmacoepidemiology Group, Division of Diagnostics 6/CDER/FDA, previously provided by Plaintiffs on July 18, 2008 as part of Plaintiffs' Notice of Supplemental Authority in support of Plaintiffs' opposition to Defendants' motion to exclude the testimony of experts Dr. Trimble, Dr. Kruszewski and Dr. Blume. See MDL ECF Doc. # 1365;
56. Transcript of proceedings from Food and Drug Administration's July 10, 2008 Joint Meeting of the Peripheral and Central Nervous System Drugs Advisory Committee (PCNS) and the Psychopharmacologic Drugs Advisory Committee (PDAC), presented by Defendants to the US District Court, District of Massachusetts, as Defendants' Exhibit 6, during the parties' *Daubert* hearing on July 23, 2008. Said transcript is also available at the following website:  
<http://www.fda.gov/ohrms/dockets/ac/08/transcripts/2008-4372t1.pdf>;

57. US Department of Justice, Drug Enforcement Administration, Microgram Bulletin, September 2004, p. 167-168 available at <http://www.usdoj/dea/programs/forensicsci/microgram>;
58. FDA's Information for Healthcare Professionals Suicide Behavior and Ideation and Antiepileptic Drugs, dated December 16, 2008, and available at <http://www.fda.gov/cder/drug/InfoSheets/HCP/antiepileptics200812/htm>;
59. FDA's Alert [1/31/2008, Updated 12/16/2008] on Suicidal Behavior and Ideation and Antiepileptic Drugs, available at <http://www.fda.gov/cder/drug/infopage/antiepileptics/default.htm>;
60. FDA News, FDA Requires Warnings about Risk of Suicidal Thoughts and Behavior for Antiepileptic Medications, available at <http://www.fda.gov/bbs/topics/NEWS/2008/NEW01927.html>;
61. FDA's Drug Safety Podcasts; Suicidal Thoughts and Behavior: Antiepileptic Drug, dated December 19, 2008, and available at [http://www.fda.gov/cder/drug/podcast/antiepileptics\\_full.htm](http://www.fda.gov/cder/drug/podcast/antiepileptics_full.htm);
62. FDA Dept. of Health and Human Services "Sponsor Letter" by Russell Katz, MD, dated December 16, 2008, and available at <http://www.fda.gov/cder/drug/infopage/antiepileptics/letter.pdf>, which includes proposed Medication Guide and Risk Evaluation and Mitigation Strategy (REMS);
63. FDA Alert: Suicidal Behavior and Ideation and Antiepileptic Drugs, dated May 5, 2009, and available at [www.fda.gov/cder/drug/infopage/antiepileptics](http://www.fda.gov/cder/drug/infopage/antiepileptics).
64. Pfizer's Neurontin Package Insert (Labeling), dated April 2009, publicly available at [www.accessdata.fda.gov/drugsatfda\\_docs/label/2009/020235s041,020882s028,021129s0271b1.pdf](http://www.accessdata.fda.gov/drugsatfda_docs/label/2009/020235s041,020882s028,021129s0271b1.pdf).
65. Defendants' publicly available SEC filings for Pfizer, Inc., including December 1996 Annual Report, December 1998 Annual Report, December 1999 Annual Report, December 2001 Annual Report, December 2002 Annual Report, December 2003 Annual Report, December 2004 Annual Report, December 2005 Annual Report, December 2006 Annual Report, December 2007 Annual Report, December 2008 Annual Report, August 2000 Quarterly Report, November 2000 Quarterly Report, April 2001 Quarterly Report, July 2001 Quarterly Report, September 2001 Quarterly Report, May 2002 Quarterly Report, September 2002 Quarterly Report, August 2003 Quarterly Report, September 2003 Quarterly Report, March 2004 Quarterly Report and May 2009 Quarterly Report. Said documents are publicly available at the following website: [www.pfizer.com/investors/sec\\_filings/sec\\_filings.jsp](http://www.pfizer.com/investors/sec_filings/sec_filings.jsp).

To the extent any additional discovery and investigation provides additional facts and legal contentions that may substantially alter these disclosures, Plaintiff reserves the right to amend or supplement without prejudice any and all disclosures herein consistent with these developments, including identifying additional areas of information, relevant documents, and tangible things that support their claims or defenses in this case.

Pursuant to Fed. R. Civ. P. 26(b)(5), Plaintiffs object to disclosure or production of documents and materials generated during the course of this litigation that constitute attorney work product or that contain privileged attorney-client communications. These documents and materials may consist, among others, of communications or correspondence between counsel and Plaintiff to facilitate the rendering of legal advice. These documents may be exempt from discovery pursuant to Fed. R. Civ. P. 26(b)(3), 26(b)(4)(B), and/or the applicable attorney-client privilege.

Dated: September 22, 2009

s/ Kenneth B. Fromson  
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STATE OF NEW YORK  
COUNTY OF ALBANY

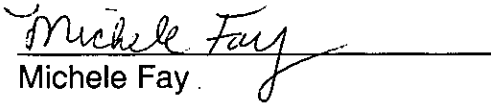
ss:

MICHELE FAY, being duly sworn says: I am not a party to the action, am over 18 years of age and reside at Schaghticoke, New York.

On September 22, 2009, I served a copy of the annexed **PLAINTIFF'S FURTHER SUPPLEMENTAL RULE 26(a)(1) DISCLOSURES** in the following manner:

By mailing same in a sealed envelope, with postage prepaid thereon, in a post-office or official depository of the U. S. Postal Service within the State of New York, addressed to the last known address of the addressee(s) as indicated below:

Mark Cheffo, Esq.  
Skadden, Arps, Slate, Meagher & Flom, LLP  
Four Times Square  
New York, NY 10036

  
Michele Fay